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May 13, 2024

Via ECF

Hon. Renée M. Bumb
Chief, United States District Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Courtroom Room 3D
Camden, New Jersey 08101

Re: In re Valsartan, Losartan and Irbesartan Products Liability Litigation
MDL No. 19-2875 (RMB)

Dear Chief Judge Bumb:

We represent the Hetero Defendants in the above referenced matter. The Court has scheduled an in-person case management conference to occur on June 25, 2024 at 2:30 pm. (D.E. 2707). Together with counsel for Plaintiffs, we write to request that the Court consider convening a conference on an earlier date at which only counsel for Plaintiffs and counsel for the Hetero Defendants appear. As the Court is aware from the letter submitted by Plaintiffs' lead counsel. (D.E. 2074), Plaintiffs and the Hetero Defendants have settled the valsartan economic loss claims, personal injury claims, and medical monitoring claims, as well as the losartan personal injury and medical monitoring claims. We would like to meet with the Court to discuss the next steps for presenting the settlements to the Court for preliminary approval, separate from the other issues to be addressed at the conference on June 25, 2024, or a rescheduled date, which is likely to involve a large agenda of issues unrelated to the Hetero settlements. We believe it would be most productive to discuss the Hetero settlement issues separately.

Counsel for Plaintiffs and the Hetero Defendants are available on May 23 in the morning, May 29, May 31, and June 3 to meet with the Court. I have spoken with Your Honor's court room deputy, and he suggested that we make this request for the Court's consideration.

Respectfully submitted,

/s/ Eric I. Abraham
ERIC I. ABRAHAM

Cc: all counsel of record via ECF